

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

LAYUNICE CONFER,

Plaintiff,

vs.

RPAI US MANAGEMENT, LLC a foreign  
limited liability company, NEW ALBERTSON'S,  
INC., a foreign corporation, d/b/a JEWEL-OSCO,  
and JEWEL FOOD STORES, INC.,  
a foreign corporation,

Defendants.

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) **Jury Demanded**  
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**NOTICE OF REMOVAL**

RPAI US MANAGEMENT LLC, incorrectly sued as “RPAI US MANAGEMENT, LLC”, the Defendant in the above entitled cause, seeks removal from the Circuit Court of Cook County and to the United States District Court, Northern District of Illinois, Eastern Division and, in support thereof, allege as follows:

1. This action was commenced against RPAI US MANAGEMENT, LLC, in the Circuit Court of Cook County, Illinois on 3/19/18. A copy of Plaintiff's Complaint was served upon Defendant RPAI US MANAGEMENT LLC on 5/15/18.

2. At the time the action was commenced and since then, upon information and belief, the Plaintiff was and is a citizen of the County of Cook, State of Illinois and Defendant, RPAI US MANAGEMENT LLC, was and is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Oak Brook, Illinois.

3. The amount in controversy exceeds \$75,000.00 exclusive of interest and costs, as appears from Plaintiff's Complaint. (A copy of which is attached hereto and incorporated herein by reference in this Notice as Exhibit “A”). Plaintiff, LAYUNICE CONFER, allegedly sustained injuries to her body and limbs, both internally and externally, as well as bodily pain and injury from the time of the incident

until now and will allegedly continue to sustain them in the future. Plaintiff has demanded judgment against Defendant in an amount in excess of \$50,000.00. On information and belief, Plaintiff sustained injuries to her shoulder and has accrued medical bills in excess of \$17,000.00.

4. This action is a civil one of which the United States District Courts have original jurisdiction under 28 USC §1332.

5. The Defendant RPAI US MANAGEMENT LLC attaches to this notice copies of all process, pleadings, and orders that have been served on it. (A copy of which are attached hereto and incorporated by reference in this Notice as Exhibit “B”).

WHEREFORE, the Defendant, RPAI US MANAGEMENT LLC, prays that this cause be removed to the United States District Court for the Northern District of Illinois.

**BRYCE DOWNEY & LENKOV LLC**

RPAI US MANAGEMENT LLC,

By: s:/Rich Lenkov  
One of Defendant's Attorneys

Rich Lenkov, #6231079  
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STATE OF ILLINOIS        )  
                                      ) SS.  
COUNTY OF COOK         )

Rich Lenkov, being first duly sworn on oath, deposes and says that:

1. He is one of the attorneys for the Defendant in this cause;
2. He has prepared and read the notice of removal filed in this cause and has personal knowledge of the facts and matters contained in it; and
3. The facts and allegations contained in the notice of removal are true and correct.

**BRYCE DOWNEY & LENKOV LLC**

RPAI US MANAGEMENT LLC,

By: s:/Rich Lenkov  
One of Defendant's Attorneys

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